

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

ZURICH AMERICAN INSURANCE)	
COMPANY,)	
)	
Plaintiff and Counterclaim-Defendant,)	
)	
v.)	Case No. 1:21-cv-11621-PBS
)	
MEDICAL PROPERTIES TRUST, INC.,)	
)	
Defendant and Counterclaim-Plaintiff.)	
)	
-and-)	
)	
STEWARD HEALTH CARE SYSTEM LLC,)	
)	
Plaintiff,)	
)	
v.)	Case No. 1:21-cv-11902-PBS
)	
AMERICAN GUARANTEE AND LIABILITY)	
INSURANCE COMPANY and ZURICH)	
AMERICAN INSURANCE COMPANY,)	
)	
Defendants.)	JULY 18, 2023

JOINT MOTION FOR ENTRY OF CONFIDENTIALITY STIPULATION

Plaintiff Zurich American Insurance Company and Defendant American Guarantee and Liability Insurance Company (collectively “Zurich”), Defendant Medical Properties Trust, Inc. (“MPT”) and Plaintiff Steward Health Care System LLC (“Steward”) jointly move pursuant to Fed. R. Civ. P. 26(c)(1)(G) for entry of the attached Confidentiality Stipulation in each of the two cases referenced above, Case Nos. 1:21-cv-11621-PBS and 1:21-cv-11902-PBS (the “Actions”). Good cause exists to grant this Motion. Among other things, discovery in the Actions will involve the production of confidential, proprietary, trade secret, and/or private

information for which special protection is warranted. Accordingly, the parties jointly move the Court to grant this motion.

**ZURICH AMERICAN INSURANCE
COMPANY**

By its attorney,

/s/ Michael Menapace

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**MEDICAL PROPERTIES TRUST,
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By its attorneys,

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**STEWARD HEALTHCARE
SYSTEM LLC**

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**AMERICAN GUARANTEE AND LIABILITY
INSURANCE COMPANY**

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CERTIFICATE OF SERVICE

I hereby certify that this document was filed through the ECF system and will therefore be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those participants indicated as non-registered participants.

/s/ *Michael Menapace*

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